

Clean Air Act Section 126 Petition Concerning Schiller Station

February 20, 2014
Eliot, Maine

Meeting Agenda



I. Overview

1. Clean Air Act section 126
2. Permitted vs. actual SO₂ emissions trends at Schiller
3. Historical ambient SO₂ data in Portsmouth area
4. Upcoming EPA programs for power plants
 - a) 1-Hour SO₂ National Ambient Air Quality Standard
 - b) Mercury and Air Toxics Standards (MATS)
 - c) Carbon pollution standards for existing power plants
5. Overview of Petitioner's submittal
6. Correspondences received since receipt of petition

II. Discussion

III. Next Steps

Clean Air Act

Section 126



- Under section 126 of the CAA, a state **(or political subdivision)** may petition the Administrator for a finding that a major source or group of stationary sources **emits** or **would emit** any pollutant in violation of the “good neighbor” provision [CAA section 110(a)(2)(D)(i)].
 - 110(a)(2)(D)(i)(I) prohibits any source in one state from emitting any air pollutant in amounts which will contribute significantly to nonattainment in, or interfere with maintenance by, any other state with respect to any NAAQS.
- The Clean Air Act gives EPA 60 days to grant or deny the petition.
 - 307(d)(10) allows EPA to extend deadlines that require final action in less than six months by an additional six months after the proposal date.
 - EPA extended the deadline to May 8, 2014 (60 days plus 6 months).

Clean Air Act

Section 126

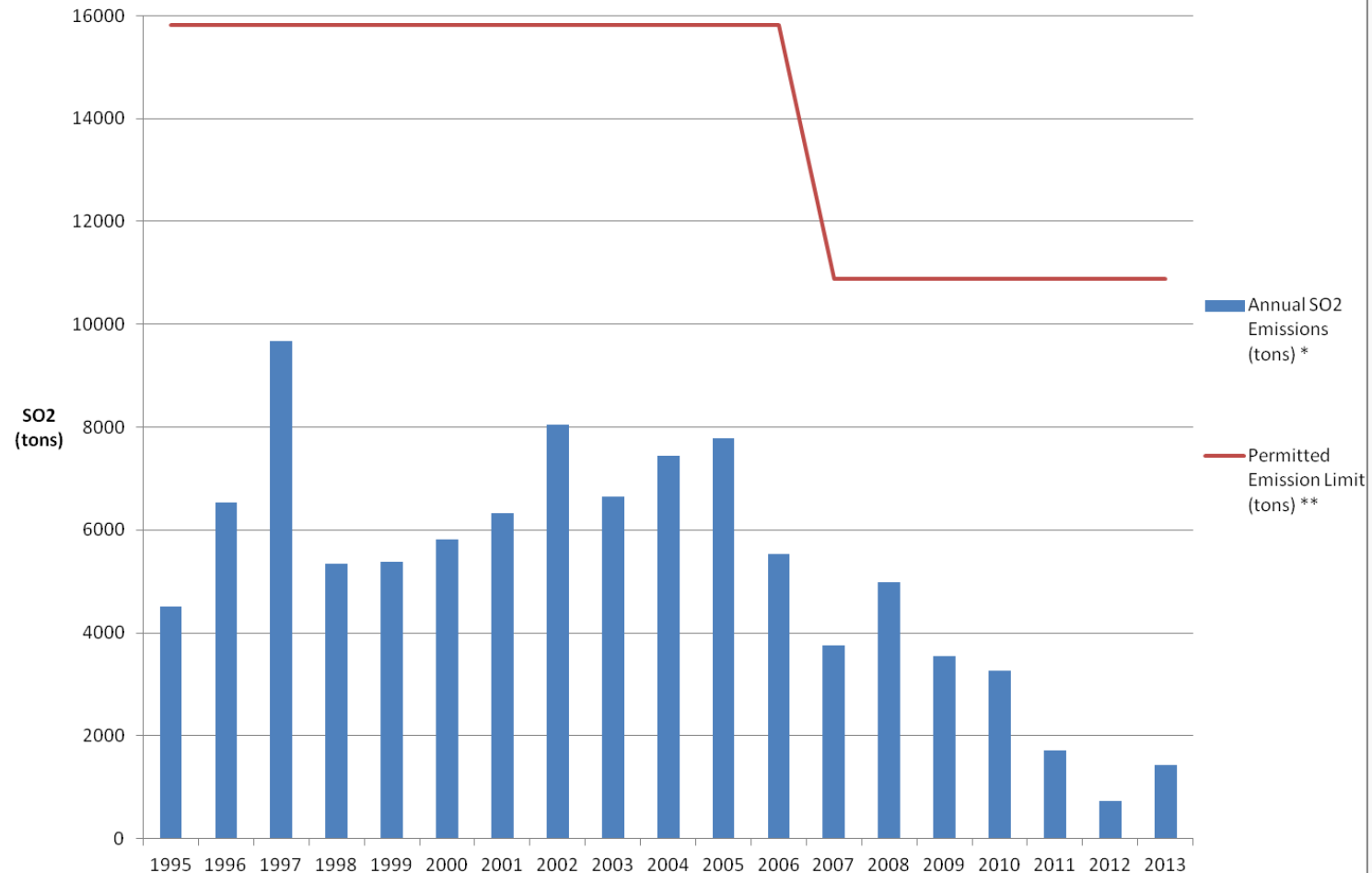


- If the EPA grants the petition and makes a finding that the source emits air pollutants in violation of the good neighbor provision, section 126(c) provides that EPA may permit the continued operation of the source if it complies with EPA-established emissions limitations and compliance schedules (including increments of progress) designed to bring about compliance with the good neighbor provision as expeditiously as practicable and at the latest within 3 years of the finding

SO₂ Emissions Trends at Schiller Station



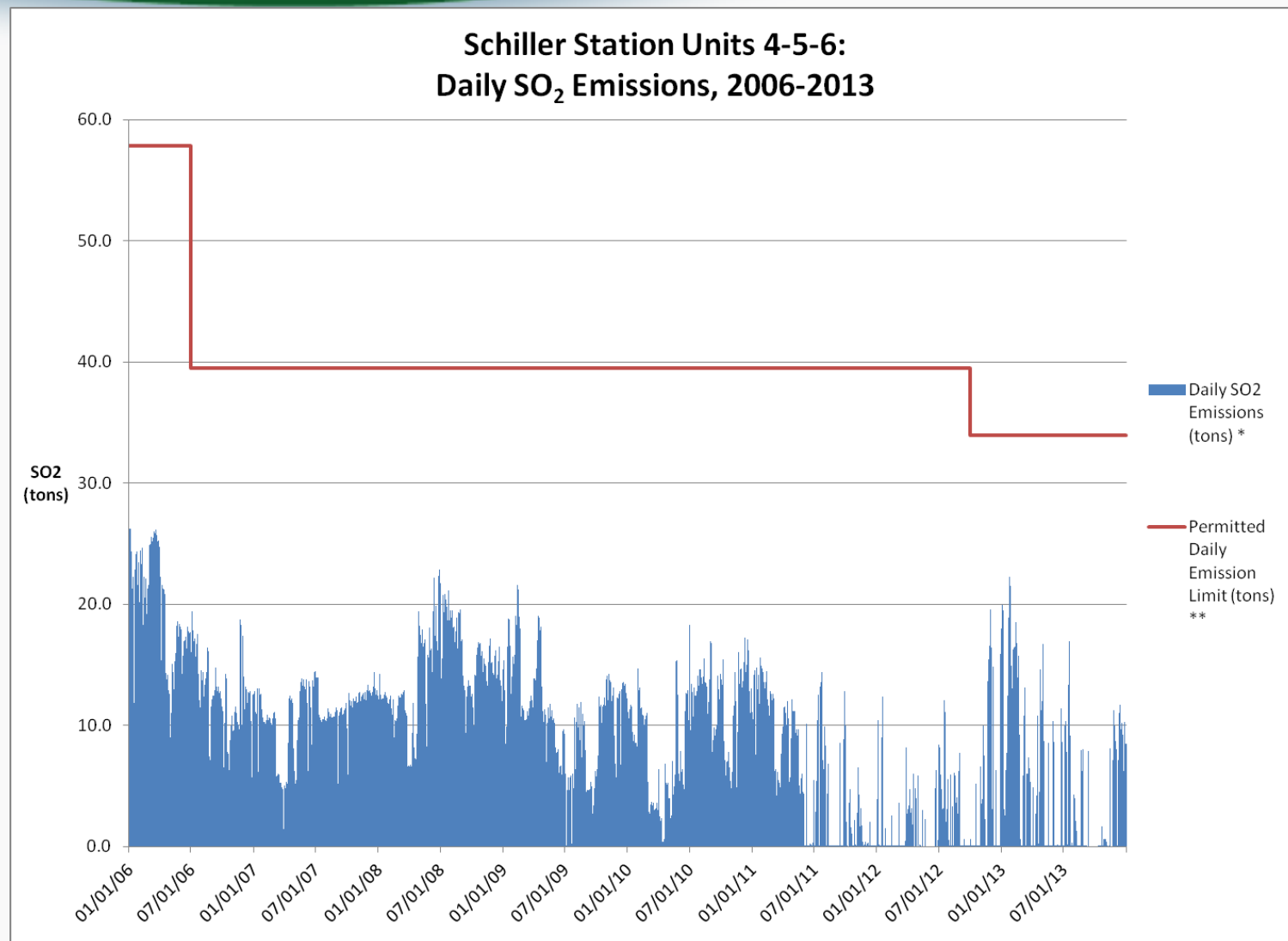
Schiller Station Units 4-5-6:
Annual SO₂ Emissions, 1995-2013



* Annual SO₂ Emissions based on data retrieved from EPA's Air Markets Program Database

** Permitted Emission Limit based on SO₂ emission limits in NH DES permit TV-OP-053 and amended limits to Unit 5 in TP-B-0501 (effective July 2006)

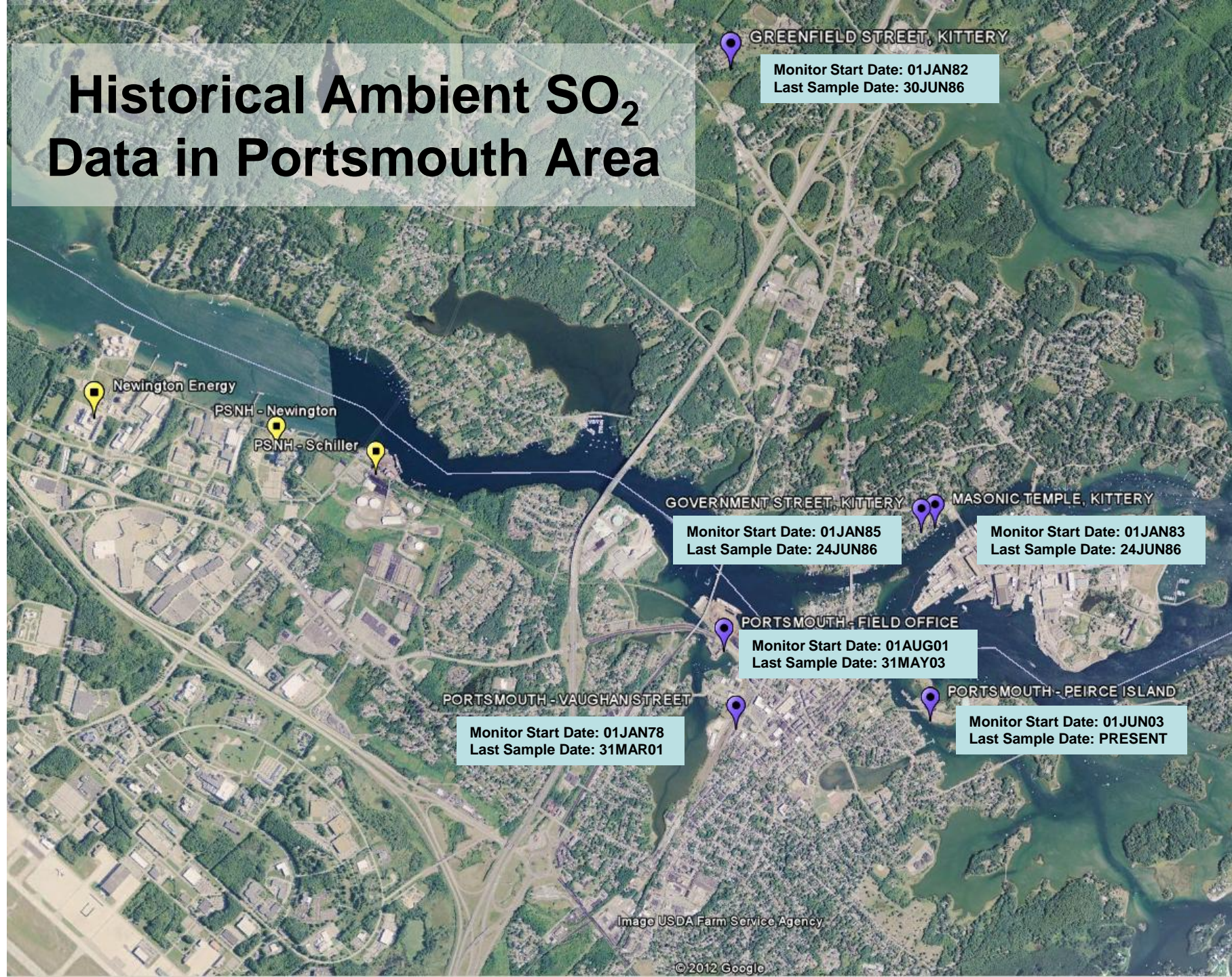
Daily SO₂ Emissions During 2006 - 2013



* Daily SO₂ Emissions based on data retrieved from EPA's Air Markets Program Database

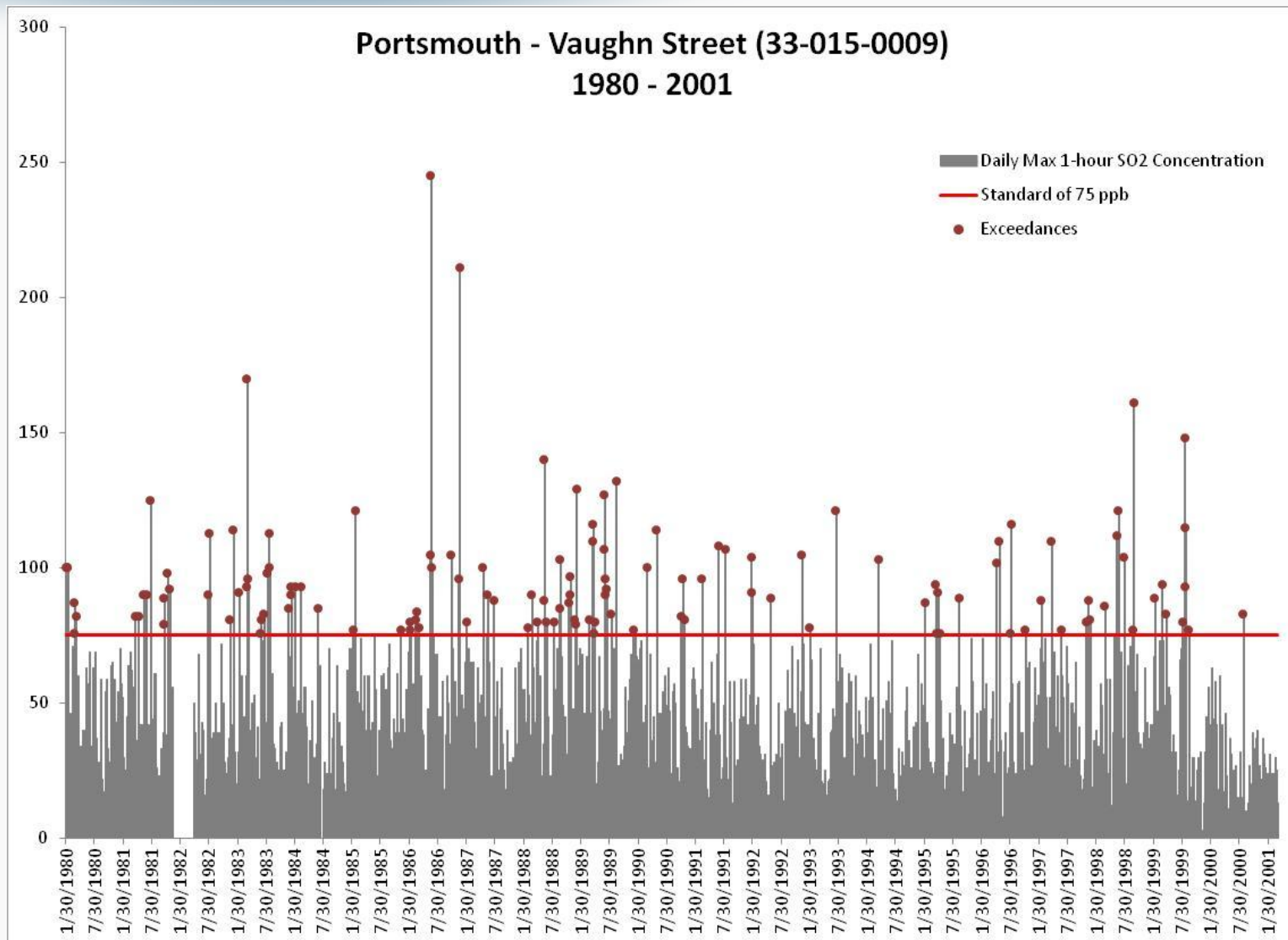
** Permitted Daily Emission Limit based on SO₂ emission limits in NH state regulation ENV-A 402.04, the amended limit to Unit 5 in TP-B-0501 (effective July 2006), and the amended limits to Units 4 & 6 in TP-0106 (effective October 2012)

Historical Ambient SO₂ Data in Portsmouth Area



Vaughn Street, Portsmouth, NH

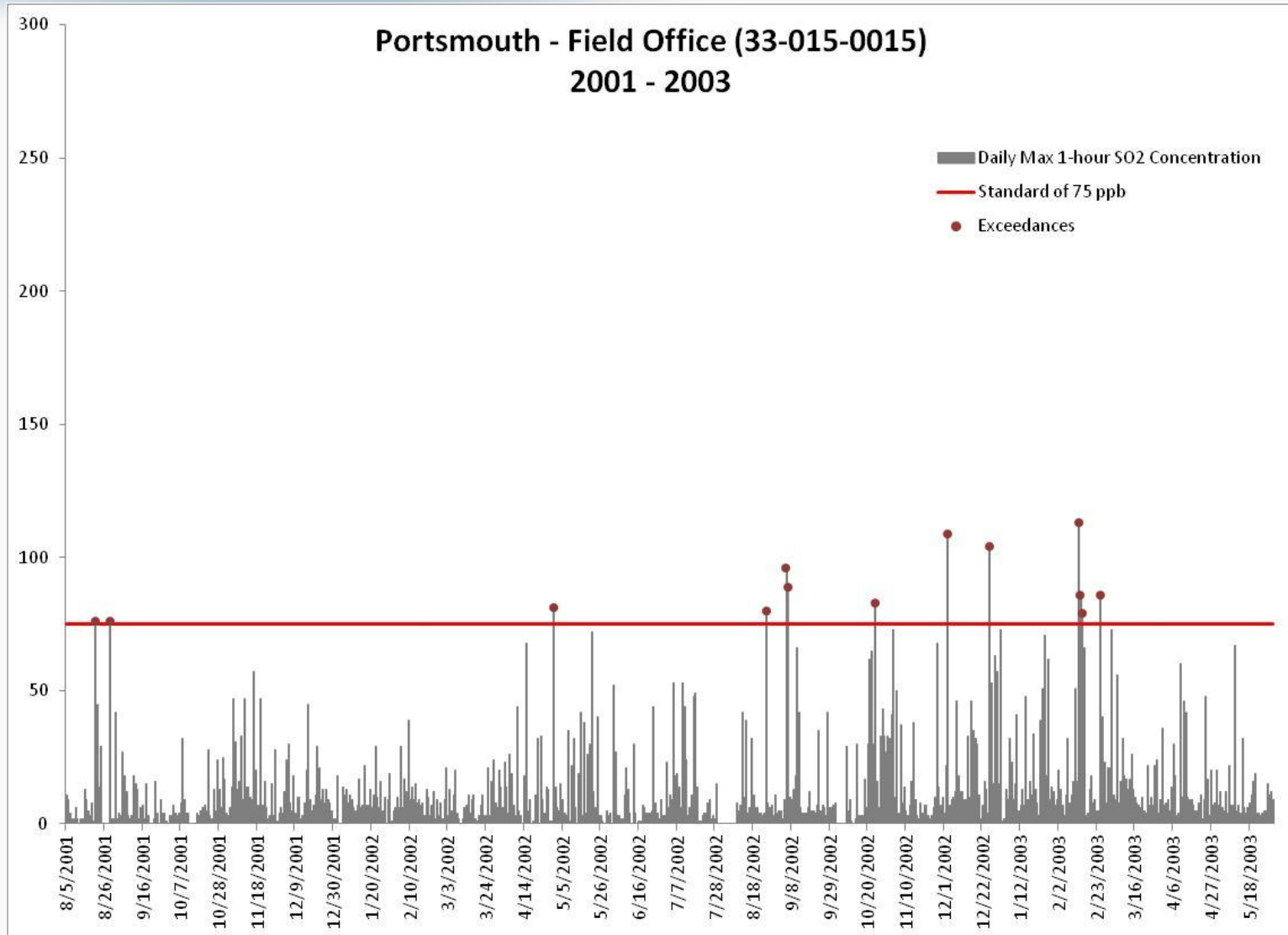
AQS Site ID: 33-015-0009



Portsmouth - Vaughn Street monitor data based on data available through EPA's Air Quality System database

Field Office, Portsmouth, NH

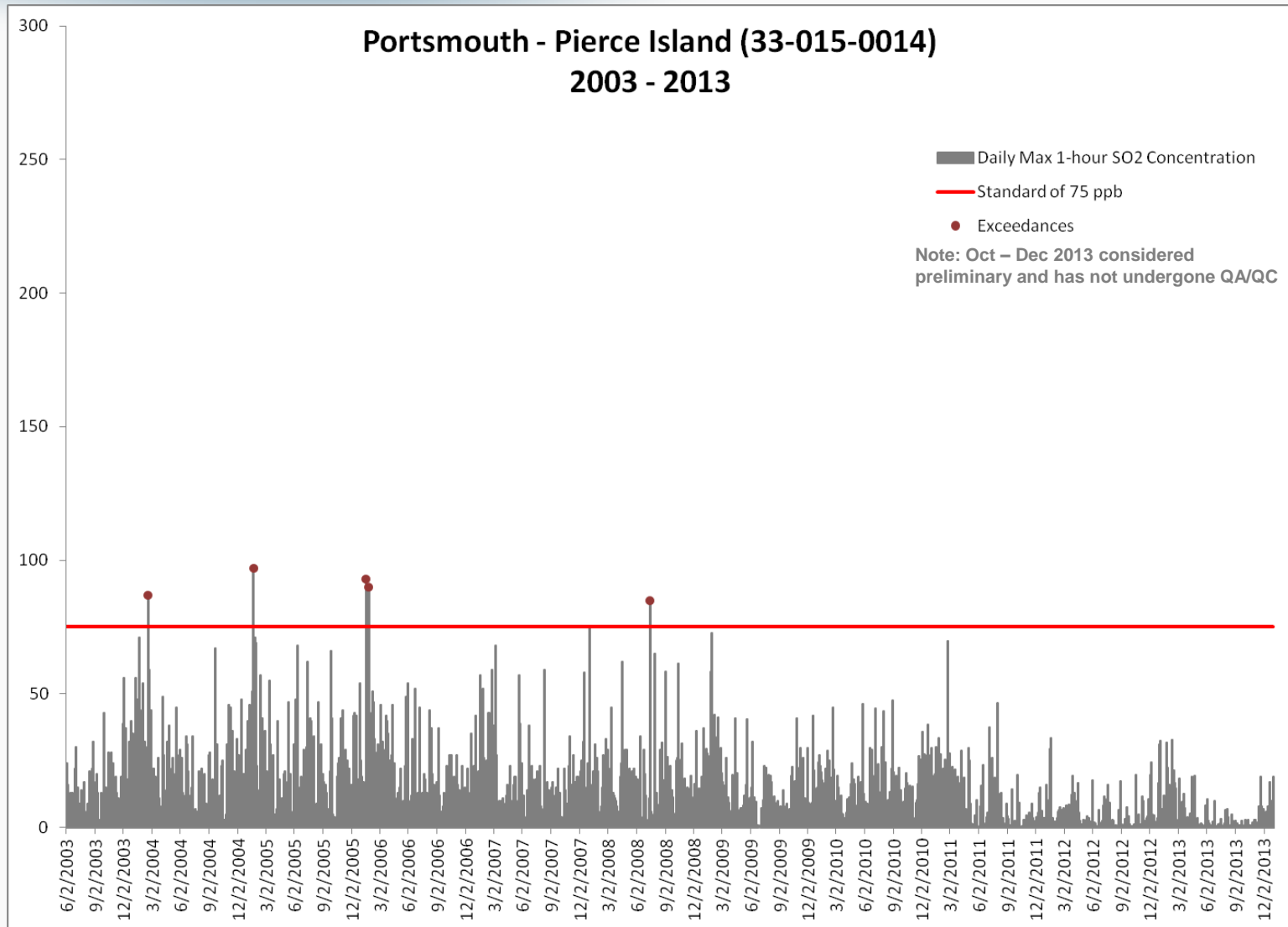
AQS Site ID: 33-015-0015



Portsmouth – Field Office monitor data based on data available through EPA's Air Quality System database

Pierce Island, Portsmouth, NH

AQS Site ID: 33-015-0014



Portsmouth – Pierce Island monitor data based on data available through EPA's Air Quality System database (June 2006 – Sept 2013) and datasets provided through AirNow (Oct 2013 – Dec 2013)

1-Hour SO₂ National Ambient Air Quality Standard



- June 2010 – EPA adopts new 1-hour health-based ambient air quality standard for SO₂ of 75 parts per billion
- Initial nonattainment area designations based on violating monitors completed in August 2013 – 29 areas designated
 - Two additional future rounds of initial designations based on modeling (2017) and monitoring (2020) are planned
- SO₂ Data Requirements Rule
 - Objective is to provide information to EPA in an orderly fashion to inform initial area designations
 - Proposal targeted for this year

Mercury and Air Toxics Standards (MATS)



- Dec 2011 MATS will control the emission air toxics, such as mercury (Hg), hydrogen chloride (HCl), and other non-Hg metals, from power plants
- Compliance date for MATS is April 2015
 - PSNH Schiller Station has submitted a compliance extension request seeking one additional year to comply with MATS emission limits
 - If granted by NH DES, Schiller's compliance date will be April 2016
- Control technologies designed to reduce HCl emissions can also significantly reduce SO₂ emissions
 - SO₂ has similar qualities to HCl, allowing controls for one to impact the other
 - Schiller has proposed to install a system to reduce HCl and comply with the MATS HCl emission limit. The proposed system's impact on SO₂ emissions at Schiller is unknown at this time

Carbon Pollution Standards for Existing Power Plants



- President Obama's Climate Action Plan tasks EPA with reducing carbon pollution from power plants
- EPA intends to regulate carbon pollution from power plants under Clean Air Act section 111
- Clean Air Act section 111 lays out different approaches for new and existing stationary sources
 - 111(b) – Federal standards for new, modified and reconstructed sources (proposed 9/20/13)
 - 111(d) – State programs for existing sources that are equivalent to federal guidelines
- Programs for Existing Sources – Timeline
 - Proposed guidelines: June 1, 2014
 - Final guidelines: June 1, 2015
 - State plans due: June 30, 2016

Overview of Petitioner's Submittal



- The Town of Eliot, Maine, submitted its section 126 petition on September 3, 2013.
 - Petition asks EPA to find coal-fired generating units at Schiller Station in Portsmouth, New Hampshire, are causing violations of the 1-hour SO₂ NAAQS in the Town of Eliot.
 - Eliot is seeking to reduce SO₂ emissions from Schiller's coal-fired generating units.
 - The petition provided modeling based on Allowable Emissions
 - It also provided modeling based on Actual Emissions

Correspondences Received Since Receipt of Petition



- September 17, 2013
 - Letter from U.S. Representative Pingree (ME-1st district) to EPA
- November 26, 2013
 - Letter from ME DEP to Eliot, ME
- December 19, 2013
 - Letter from U.S. Senator King (ME) to EPA
- February 4, 2014
 - Letter from PSNH to EPA



Discussion / Next Steps